

RECEIVED



2004 SEP - 1 AM 8:09

BellSouth Telecommunications, Inc
333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

guy.hicks@bellsouth.com

T.R.A. DOCKET ROOM

30
August 27, 2004

Guy M. Hicks
General Counsel
615 214 6301
Fax 615 214 7406

VIA HAND DELIVERY

Hon Pat Miller
Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re. *Approval of the Amendments to the Interconnection Agreement Negotiated by BellSouth Telecommunications, Inc and Z-Tel Communications, Inc Pursuant to Sections 251 and 252 of the Telecommunications Act of 1996*
Docket No. 04-00273

Dear Chairman Miller:

Pursuant to Section 252(e) of the Telecommunications Act of 1996, Z-Tel Communications, Inc. and BellSouth Telecommunications, Inc. are hereby submitting to the Tennessee Regulatory Authority the original and fourteen copies of the attached Petition for Approval of the Amendments to the Interconnection Agreement dated April 18, 2003. The first Amendment provides for Line Splitting rates and the second Amendment provides for Melded Tandem Switching.

Thank you for your attention to this matter

Sincerely yours,

Guy M. Hicks

cc. Peggy Rubino, Z-Tel Communications, Inc.

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In re: *Approval of the Amendments to the Interconnection Agreement Negotiated by BellSouth Telecommunications, Inc and Z-Tel Communications, Inc Pursuant to Sections 251 and 252 of the Telecommunications Act of 1996*

Docket No. _____

**PETITION FOR APPROVAL OF THE
AMENDMENT TO THE INTERCONNECTION AGREEMENT
NEGOTIATED BETWEEN BELLSOUTH TELECOMMUNICATIONS, INC.
AND Z-TEL COMMUNICATIONS, INC.**
PURSUANT TO THE TELECOMMUNICATIONS ACT OF 1996

COME NOW, Z-Tel Communications, Inc ("Z-Tel") and BellSouth Telecommunications, Inc, ("BellSouth"), and file this request for approval of the Amendments to the Interconnection Agreement dated April 18, 2003 (the "Amendment") negotiated between the two companies pursuant to Sections 251 and 252 of the Telecommunications Act of 1996, (the "Act"). In support of their request, Z-Tel and BellSouth state the following:

1. Z-Tel and BellSouth have successfully negotiated an agreement for interconnection of their networks, the unbundling of specific network elements offered by BellSouth and the resale of BellSouth's telecommunications services to Z-Tel. The Interconnection Agreement was approved by the Tennessee Regulatory Authority ("TRA") on June 2, 2003.

2. The parties have recently negotiated two Amendments to the Agreement. The first Amendment provides for Line Splitting rates and the second Amendment provides for Melded Tandem Switching. Copies of the Amendments are attached hereto and incorporated herein by reference.

3. Pursuant to Section 252(e) of the Telecommunications Act of 1996, A-Tel and BellSouth are submitting their Amendments to the TRA for its consideration and approval. The Amendments provide that either or both of the parties is authorized to submit this Amendment to the TRA for approval.

4. In accordance with Section 252(e) of the Act, the TRA is charged with approving or rejecting the negotiated Amendments between BellSouth and Z-Tel within 90 days of its submission. The Act provides that the TRA may only reject such an agreement if it finds that the agreement or any portion of the agreement discriminates against a telecommunications carrier not a party to the agreement or the implementation of the agreement or any portion of the agreement is not consistent with the public interest, convenience and necessity.

5. Z-Tel and BellSouth aver that the Amendments are consistent with the standards for approval.

6. Pursuant to Section 252(i) of the Act, BellSouth shall make the Agreement available upon the same terms and conditions contained therein.

Z-Tel and BellSouth respectfully request that the TRA approve the Amendments negotiated between the parties.

This 3 day of July, 2004.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC

By:

Guy M. Hicks
333 Commerce Street, Suite 2101
Nashville, Tennessee 37201-3300
(615) 214-6301
Attorney for BellSouth

**Amendment to the Agreement
Between
Z-Tel Communications, Inc.
and
BellSouth Telecommunications, Inc.
Dated April 18, 2003**

Tennessee

Pursuant to this Amendment, (the "Amendment"), Z-Tel Communications, Inc ("Z-Tel"), and BellSouth Telecommunications, Inc ("BellSouth"), hereinafter referred to collectively as the "Parties," hereby agree to amend that certain Interconnection Agreement for Tennessee between the Parties dated April 18, 2003, ("Agreement") to be effective ten (10) days following the date of the last signature executing the Amendment

WHEREAS, BellSouth and Z-Tel entered into the Agreement on April 18, 2003, and,

NOW THEREFORE, in consideration of the mutual provisions contained herein and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties hereby covenant and agree as follows

- 1 The Parties agree to add the following provision to Attachment 3, Section 4 1, and the associated rates as set forth in Exhibit 1 of this Amendment, attached hereto and incorporated herein by this reference
- 4 1 2 Where Z-Tel utilizes portions of the BellSouth network in originating or terminating traffic, the Tandem Switching rates are applied in call scenarios where the Tandem Switching Network Element has been utilized. Because switch recordings cannot accurately indicate on a per call basis when the Tandem Switching Network Element has been utilized for an interoffice call originating from a UNE port and terminating to a BellSouth, Independent Company or Facility-Based CLEC office, BellSouth has developed, based upon call studies, a melded rate that takes into account the average percentage of calls that utilize Tandem Switching in these scenarios. BellSouth shall apply the melded Tandem Switching rate for every call in these scenarios. BellSouth shall utilize the melded Tandem Switching Rate until BellSouth has the capability to measure actual Tandem Switch usage in each call scenario specifically mentioned above, at which point the rate for the actual Tandem Switch usage shall apply. The UNE Call Flows set forth on BellSouth's website, as amended from time to time and incorporated herein by this reference, illustrate when the full or melded Tandem Switching rates apply for specific scenarios
- 2 The Parties agree to add the following provision to Attachment 3, Section 14, and the associated rates as set forth in Exhibit 2 of this Amendment, attached hereto and incorporated herein by this reference

14.1.1 When a BellSouth technician is required to be dispatched to provision the Loop, BellSouth will tag the Loop with the Circuit ID number and the name of the ordering CLEC. When a dispatch is not required to provision the Loop, BellSouth will tag the Loop on the next required visit to the End User's location. If Z-Tel wants to ensure the Loop is tagged during the provisioning process for Loops that may not require a dispatch (e.g., UVL-SL1, UVL-SL2, and UCL-ND), Z-Tel may order Loop Tagging. Rates for Loop Tagging are as set forth in Attachment 1 – Table 1.

- 3 All of the other provisions of the Agreement, dated April 18, 2003, shall remain in full force and effect.
- 4 Either or both of the Parties are authorized to submit this Amendment to the respective state regulatory authorities for approval subject to Section 252(e) of the Federal Telecommunications Act of 1996.

IN WITNESS WHEREOF, the Parties have executed this Amendment the day and year written below.

BellSouth Telecommunications, Inc.

By:



Name: Kristen E. Rowe

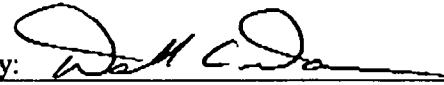
Title: Director

Date:

6/17/04

Z-Tel Communications, Inc.

By:



Name: Donald L. Davis

Title: Sr. Vice President

Date:

6-17-04

UNBUNDLED NETWORK ELEMENTS - Tennessee										Attachment 2					
CATEGORY	RATE ELEMENTS			USOC			RATES (\$)			Svc Order Submitted Manually per LSR			Svc Order Submitted Manually per LSR		
	Inten m	Zone	BCS				Rec	Nonrecurring First	Nonrecurring Add'l	First	Add I	SOMEC	SOMAN	SOMAN	SOMAN
UNBUNDLED LOCAL SWITCHING, PORT USAGE															
End Office Switching (Port Usage)															
End Office Switching Function Per MOU															
Tandem Switching (Port Usage) (Local or Access Tandem)															
Tandem Switching Function Per MOU															
Tandem Switching Function Per MOU (Married)															
Married Factor .38-50% of the Tandem Rate															
Common Transport															
Common Transport=Per Mile Per MOU															
Common Transport - Facilities Termination Per MOU															

Exhibit A

Category	Rate Element	Inten m	Zone	BCS	USOC	Rates (\$)	Rec	Nonrecurring First	Nonrecurring Add'l	First	Add I	SOMEC	SOMAN	SOMAN	SOMAN
UNBUNDLED LOCAL SWITCHING, PORT USAGE	End Office Switching (Port Usage)														
	End Office Switching Function Per MOU														
	Tandem Switching (Port Usage) (Local or Access Tandem)														
	Tandem Switching Function Per MOU														
	Tandem Switching Function Per MOU (Married)														
	Married Factor .38-50% of the Tandem Rate														
	Common Transport														
	Common Transport=Per Mile Per MOU														
	Common Transport - Facilities Termination Per MOU														

Attachment 2

Category	Rate Element	Inten m	Zone	BCS	USOC	Rates (\$)	Rec	Nonrecurring First	Nonrecurring Add'l	First	Add I	SOMEC	SOMAN	SOMAN	SOMAN
UNBUNDLED LOCAL SWITCHING, PORT USAGE	End Office Switching (Port Usage)														
	End Office Switching Function Per MOU														
	Tandem Switching (Port Usage) (Local or Access Tandem)														
	Tandem Switching Function Per MOU														
	Tandem Switching Function Per MOU (Married)														
	Married Factor .38-50% of the Tandem Rate														
	Common Transport														
	Common Transport=Per Mile Per MOU														
	Common Transport - Facilities Termination Per MOU														

UNBUNDLED NETWORK ELEMENTS - Tennessee

CATEGORY	RATE ELEMENTS	Inten m	Zone	BCS	USOC		RATES (\$)	Nonrecurring		Nonrecurring Disconnect		OSS Rates (\$)	Attachment 2	Exhibit B
								Rec	First	Add'l	First	Add'l		
Svc Order Submitted	Svc Order Submitted	Incremental Charge - Manual Svc	Svc Order Submitted	Svc Order Submitted	Incremental Charge - Manual Svc	Order vs Electronic	Order vs Electronic	Order vs Electronic	Disc 1st	Disc 1st				
UNBUNDLED PORTLOOP COMBINATIONS - COST BASED RATES														
2-WIRE VOICE GRADE LOOP WITH 2-WIRE LINE PORT (RES)														
ADDITIONAL NRCS														
Unbundled Miscellaneous Rate Element Tag Loop at End User Premise														
2-WIRE VOICE GRADE LOOP WITH 2-WIRE LINE PORT (BUS)														
ADDITIONAL NRCS														
Unbundled Miscellaneous Rate Element Tag Loop at End User Premise														
2-WIRE VOICE GRADE LOOP WITH 2-WIRE LINE PORT (BUS - PBX)														
ADDITIONAL NRCS														
Unbundled Miscellaneous Rate Element Tag Loop at End User Premise														
2-WIRE VOICE GRADE LOOP WITH 2-WIRE ANALOG LINE COIN PORT														
ADDITIONAL NRCS														
Unbundled Miscellaneous Rate Element Tag Loop at End User Premise														
2-WIRE VOICE LOOP/ 2WIRE VOICE GRADE IO TRANSPORT/ 2WIRE LINE PORT (RES)														
ADDITIONAL NRCS														
Unbundled Miscellaneous Rate Element Tag Designed Loop at End User Premise														
2-WIRE VOICE LOOP/ 2WIRE VOICE GRADE IO TRANSPORT/ 2WIRE LINE PORT (BUS)														
ADDITIONAL NRCS														
Unbundled Miscellaneous Rate Element Tag Designed Loop at End User Premise														
2-WIRE VOICE LOOP/ BUS ONLY - WITH 2-WIRE DID TRUNK PORT														
ADDITIONAL NRCS														
Unbundled Miscellaneous Rate Element Tag Loop at End User Premise														
2-WIRE ISDN DIGITAL GRADE LOOP WITH 2-WIRE ISDN DIGITAL LINE SIDE PORT														
ADDITIONAL NRCS														
Unbundled Miscellaneous Rate Element Tag Loop at End User Premise														
UNBUNDLED CENTREX PORTLOOP COMBINATIONS - COST BASED RATES														
UNE-P CENTREX - 1AES - (Valid in AL, FL, GA, KY, LA, MS, & TN only)														
Additional Non-Recurring Charges (NRCC)														
Unbundled Miscellaneous Rate Element Tag Loop at End User Premise														
Unbundled Miscellaneous Rate Element Tag Design Loop at End User Premise														

CATEGORY	RATE ELEMENTS	Inten m	Bcs	USOC		RATES (\$)	Attachment 2		Exhibit B		
							Rec	First Add'l	First Add'l	Charge - Manual Svc Order vs Electronic- Disc 1st	Incremental Charge - Manual Svc Order vs Electronic- Disc Add'l
											GSS Rates (\$)
UNE-P CENTREX - 5ESS (Valid in All States)											
Additional Non-Recurring Charges (NRC)											
Unbundled Miscellaneous Rate Element Tag Loop at End Use Premise			UEP95	URETL			12 12	1 34			
Unbundled Miscellaneous Rate Element Tag Design Loop at End Use Premise			UEP95	URETN			15 32	1 34			
UNE-P CENTREX - DMS100 (Valid in All States)											
Additional Non-Recurring Charges (NRC)											
Unbundled Miscellaneous Rate Element Tag Loop at End Use Premise			UEP9D	URETL			12 12	1 34			
Unbundled Miscellaneous Rate Element Tag Design Loop at End Use Premise			UEP9D	URETN			15 32	1 34			
UNE-P CENTREX - EWSO (Valid in AL, FL, KY, LA, MS & TN)											
Additional Non-Recurring Charges (NRC)											
Unbundled Miscellaneous Rate Element Tag Loop at End Use Premise			UEP9E	URETL			12 12	1 34			
Unbundled Miscellaneous Rate Element Tag Design Loop at End Use Premise			UEP9E	URETN			15 32	1 34			
UNE-P CENTREX - DCO - Valid in AL, KY, LA, MS, & TN)											
Additional Non-Recurring Charges (NRC)											
Unbundled Miscellaneous Rate Element Tag Loop at End Use Premise			UEP93	URETL			12 12	1 34			
Unbundled Miscellaneous Rate Element Tag Design Loop at End Use Premise			UEP93	URETN			15 32	1 34			
UNBUNDLED PORT LOOP COMBINATIONS - MARKET RATES											
2-WIRE VOICE GRADE LOOP WITH 2-WIRE LINE PORT (RES)											
ADDITIONAL NRCs											
Unbundled Miscellaneous Rate Element Tag Loop at End User Premise			UEPRX	URETL			12 12	1 34			
2-WIRE VOICE GRADE LOOP WITH 2-WIRE LINE PORT (BUS)											
ADDITIONAL NRCs											
Unbundled Miscellaneous Rate Element Tag Loop at End User Premise			UEPBX	URETL			12 12	1 34			
2-WIRE VOICE GRADE LOOP WITH 2-WIRE LINE PORT (RES - PBX)											
ADDITIONAL NRCs											
Unbundled Miscellaneous Rate Element Tag Loop at End User Premise			UEPRG	URETL			12 12	1 34			
2-WIRE VOICE GRADE LOOP WITH 2-WIRE LINE PORT (BUS - PBX)											
ADDITIONAL NRCs											
Unbundled Miscellaneous Rate Element Tag Loop at End User Premise			UEPPX	URETL			12 12	1 34			
2-WIRE VOICE GRADE LOOP WITH 2-WIRE ANALOG LINE COIN PORT											
ADDITIONAL NRCs											
Unbundled Miscellaneous Rate Element Tag Loop at End User Premise			UEPCO	URETN			12 12	1 34			
2-WIRE VOICE LOOP 2WIRE VOICE GRADE IO TRANSPORT/2WIRE LINE PORT (RES)											
ADDITIONAL NRCs											
Unbundled Miscellaneous Rate Element Tag Designed Loop at End User Premise			UEPFR	URETN			15 32	1 34			
2-WIRE VOICE LOOP/2WIRE VOICE GRADE IO TRANSPORT/2WIRE LINE PORT (BUS)											
ADDITIONAL NRCs											
Unbundled Miscellaneous Rate Element Tag Designed Loop at End User Premise			UEPFB	URETN			15 32	1 34			
2-WIRE VOICE LOOP/2WIRE VOICE GRADE IO TRANSPORT/2WIRE LINE PORT (PBX)											
ADDITIONAL NRCs											
Unbundled Miscellaneous Rate Element Tag Design Loop at End User Premise			UEPFP	URETN			15 32	1 34			

CATEGORY	RATE ELEMENTS	Inten m	BCS	USOC			RATES (\$)		Nonrecurring		Nonrecurring Disconnect		Attachment 2		Exhibit B		
							Rec		First	Add'l	First	Add'l	Svc Order Submitted	Order Manually Submitted per LSR	Incremental Charge - Manual Svc Order vs Electronic-Disc Add'l	Incremental Charge - Manual Svc Order vs Electronic-Disc Add'l	Incremental Charge - Manual Svc Order vs Electronic-Disc Add'l
UNBUNDLED PORTLOOP COMBINATIONS - MARKET BASED RATES																	
2-WIRE VOICE GRADE LOOP-BUS ONLY - WITH 2-WIRE DID TRUNK PORT																	
ADDITIONAL NRCS																	
Unbundled Miscellaneous Rate Element Tag Loop at End User Premise							UEPPX	URETN									
2-WIRE ISDN DIGITAL GRADE LOOP WITH 2-WIRE ISDN DIGITAL LINE SIDE PORT																	
ADDITIONAL NRCS																	
Unbundled Miscellaneous Rate Element, Tag Loop at End User Premise							•UEPPB	UEPPR	—URETL	—	12.12*	1.34*					
Unbundled Miscellaneous Rate Element, Tag Designed Loop at End User Premise							UEPPB	UEPPR	URETN		15.32	1.34					
UNBUNDLED CENTREX PORTLOOP COMBINATIONS - MARKET RATES																	
LINE-P CENTREX - 1AES3 - (Valid in AL, FL, GA, KY, LA, MS, & TN only)																	
Additional Non-Recurring Charges (NRC)																	
Unbundled Miscellaneous Rate Element, Tag Loop at End Use Premise							UEP91	URETL			12.12	1.34					
UNE-P CENTREX - SESS (Valid in All States)							UEP91	URETN			15.32	1.34					
Additional Non-Recurring Charges (NRC)																	
Unbundled Miscellaneous Rate Element, Tag Loop at End Use Premise							UEP95	URETL			12.12	1.34					
(Unbundled Miscellaneous Rate Element, Tag Design Loop at End Use Premise)							UEP95	URETN			15.32	1.34					
UNE-P CENTREX - DM5100 (Valid in All States)																	
Additional Non-Recurring Charges (NRC)																	
Unbundled Miscellaneous Rate Element, Tag Loop at End Use Premise							UEP9D	URETL			12.12	1.34					
UNE-P CENTREX - EWSD (Valid in AL, FL, KY, LA, MS, & TN)							UEP9D	URETN			15.32	1.34					
Additional Non-Recurring Charges (NRC)																	
Unbundled Miscellaneous Rate Element, Tag Loop at End Use Premise							UEP9E	URETL			12.12	1.34					
Unbundled Miscellaneous Rate Element, Tag Design Loop at End Use Premise							UEP9E	URETN			15.32	1.34					

**Amendment to the Agreement
Between
Z-Tel Communications, Inc.
and
BellSouth Telecommunications, Inc.
Dated April 18, 2003
Tennessee**

Pursuant to this Amendment, (the "Amendment"), Z-Tel Communications, Inc ("Z-Tel"), and BellSouth Telecommunications, Inc ("BellSouth"), hereinafter referred to collectively as the "Parties," hereby agree to amend that certain Interconnection Agreement between the Parties dated April 18, 2003 ("Agreement") to be effective thirty (30) calendar days following the date of the last signature executing the Amendment

WHEREAS, BellSouth and Z-Tel entered into the Agreement on April 18, 2003, and,

NOW THEREFORE, in consideration of the mutual provisions contained herein and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties hereby covenant and agree as follows

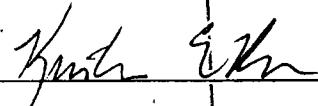
- 1 Rates identified in Exhibit 1, attached hereto and incorporated herein by this reference, shall be included in Attachment 1 Table 1
- 2 All of the other provisions of the Agreement, dated April 18, 2003, shall remain in full force and effect
- 3 Either or both of the Parties are authorized to submit this Amendment to the respective state regulatory authorities for approval subject to Section 252(e) of the Federal Telecommunications Act of 1996

Signature Page

IN WITNESS WHEREOF, the Parties have executed this Amendment the day and year written below.

BellSouth Telecommunications, Inc.

By:



Name: Kristen E. Rowe

Title: Director

Date: 6/25/04

Z-Tel Communications, Inc.

By:



Name: DONALD C. DAVIS

Title: SR. VICE PRESIDENT

Date: 5/27/04

Z-Tel Communications, Inc. - TN Line Splitting Amendment

[CCCS Amendment 2 of 3]

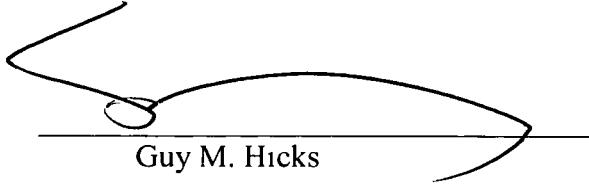
[CCCS Amendment 2 of 3]

CATEGORY	RATE ELEMENTS	Inten m	BCS	USOC	RATES (\$)		Rec	Nonrecurring First	Add'l	Nonrecurring Disconnect First	OSS Rates (\$)	Attachment 1	Table 1	
					First	Add'l							Incremental Charge - Manual Svc Order vs Electronic-Add'l	Incremental Charge - Manual Svc Order vs Electronic-Add'l
UNBUNDLED NETWORK ELEMENTS - Tennessee														
UNBUNDLED EXCHANGE ACCESS LOOP														
2 WIRE ANALOG VOICE GRADE LOOP														
Zone 1	2 Wire Analog Voice Grade Loop-Service Level 1-line Splitting-		1	UEPSR UEPSB	UEALS	13.19	31.99	20.02	10.65	1.41				
Zone 1	2 Wire Analog Voice Grade Loop-Service Level 1-line Splitting-		1	UEPSR UEPSB	UEABS	13.19	31.99	20.02	10.65	1.41				
Zone 2	2 Wire Analog Voice Grade Loop-Service Level 1-line Splitting-		2	UEPSR UEPSB	UEALS	17.23	31.99	20.02	10.65	1.41				
Zone 2	2 Wire Analog Voice Grade Loop-Service Level 1-line Splitting-		2	UEPSR UEPSB	UEABS	17.23	31.99	20.02	10.65	1.41				
Zone 2	2 Wire Analog Voice Grade Loop-Service Level 1-line Splitting-		3	UEPSR UEPSB	UEALS	22.53	31.99	20.02	10.65	1.41				
Zone 3	2 Wire Analog Voice Grade Loop-Service Level 1-line Splitting-		3	UEPSR UEPSB	UEABS	22.53	31.99	20.02	10.65	1.41				
LINE SPLITTING														
END USER ORDERING-CENTRAL OFFICE BASED														
Line Splitting - per line activation BSC owned splitter				UEPSR UEPSB	UREOS	0.61								
Line Splitting - per line activation BSC owned physical				UEPSR UEPSB	UREBP	0.61	48.96	21.39	35.06	10.79				
Line Splitting - per line activation BSC owned virtual				UEPSR UEPSB	UREBV	0.61								
M A I N T E N A N C E														
No Trouble Found - per 1/2 hour increments - Basic							8.00	55.00						
No Trouble Found - per 1/2 hour increments - Overtime							12.00	82.50						
No Trouble Found - per 1/2 hour increments - Premium							16.00	110.00						
VIRTUAL COLLOCATION														
Virtual Collocation-2 Wire Cross Connects (Loop) for Line Splitting				UEPSR UEPSB	VEALS	0.57	11.62	9.90	10.38	8.66				
Physical Collocation				UEPSR UEPSB	PEALS	0.7905	11.62	9.90	10.38	8.66				
Physical Collocation-2 Wire Cross Connects (Loop) for Line Splitting				UEPSR UEPSB										

CERTIFICATE OF SERVICE

I, Guy M. Hicks, hereby certify that I have served a copy of the foregoing Petition for Approval of the Amendments to the Interconnection Agreement on the following via United States Mail on the 7 day of July, 2004:

Peggy Rubino
Z-Tel Communications, Inc.
601 South Harbour Island Blvd.
Suite 220
Tampa, FL 33602



Guy M. Hicks